Adams County Public Library

Your Community Information Center

157 High Street, Peebles, Ohio 45660 – Phone: 937-587-2085 – Fax: 937-587-5043

Comment on FCC NPRM, Proceeding 13-184

November 8, 2013

The Adams County Public Library, in rural Adams County, Ohio, has received E-rate funding since the program began in 1998. The E-rate program has enabled us to continue to purchase our telephone and Internet access, and to upgrade our bandwidth, in spite of funding challenges we have faced over the last several years.

We strongly recommend that telephone service, including POTS and VoIP, remain Priority 1 funded services. Telephone service continues to be an essential backbone component of library services, and E-rate funding for voice communication is of significant assistance in our annual budget.

We strongly recommend that the following services continue to be eligible for Priority 1 funding:

- All voice telephone service, including POTS and VoIP (P 105)
- Internet access provided by cellular service plans, including aircards (P 102) (Internet access through cellular service plans, such as aircards, are an essential component of our Outreach Delivery services. We purchase such service with E-rate funding, and this service is our only means of Internet access in the remote areas where we delivery mobile library services.)
- Web hosting and hosted email services (P 97)

We support any effort to streamline and speed the PIA review process. Delays in the PIA review process make the option of discounted (SPI) billing moot; most of the FY's bills have been issued and paid at the full rate before our FCDL has been issued. (P 233)

We support the proposal to remove the distinction between telecommunications and Internet access. This is increasingly a distinction without a difference, adding unnecessary complexity to the E-rate process for both recipients and service providers. (P 258)

We do not support revising the discount matrix to increase applicants' matching requirements. (P 117)

We support changing the definition of rural to ensure greater funding to truly rural areas. (P 133)

We support increasing the current E-rate funding cap, to ensure that libraries and schools have sufficient funding to purchase high-speed broadband services. (P 173)

We STRONGLY support that USAC remit BEAR reimbursement checks directly to schools and libraries, rather than sending them through service providers. (P 259) Many recipients, including our organization, have suffered loss of E-rate funding by BEAR reimbursements because of the requirement that USAC remit payments through service providers. Remitting BEAR reimbursement checks directly to the

funding recipient, rather than the service provider, would be a highly effective, low-friction way to reduce waste and fraud, and improve the effectiveness of the E-rate program.

We support the proposal that PIA review only be conducted on the first year of a multi-year contract. (P 241) However, we do not support limiting recipients to only signing 3-year contracts. Many service providers offer stable services and significant discounts for contracts longer than 3 years. Such a restriction would negatively affect recipients' ability to purchase the most cost-effective service, and eventually cost USAC more money.